

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

BUCKET FILE COPY ORIGINAL

In The Matter of )  
)  
WCOV-TV )  
Montgomery, Alabama )  
Facility I.D. No. 76342 )  
Amendment of Section 73.622(b) )  
TO: Office of the Secretary )  
ATTN: Chief, Video Division, Media Bureau )

MM Docket No. FILED/ACCEPTED  
RM No. OCT - 1 2008  
Federal Communications Commission  
Office of the Secretary

SUPPLEMENT TO FURTHER AMENDMENT TO PETITION FOR RULE MAKING

Woods Communications Corporation (Woods), on September 26, 2008, submitted a Further Amendment to Petition for Rule Making. Associated with that Amendment was an Engineering Statement. The Engineering Statement, however, contained a typographical error. Transmitted herewith is a corrected Engineering Statement.

Respectfully Submitted,



Aaron P. Shainis  
Shainis & Peltzman, Chartered  
Counsel for  
Woods Communications Corporation

Enclosure

cc: w/ enclosure (via e-mail)

Nazifa Sawez (NazifaSawez@fcc.gov)

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**Engineering Statement**

The following engineering statement and attached exhibits have been prepared for **Woods Communications Corporation** ("Woods"), licensee of television station **WCOV-TV** at Montgomery, Alabama, and are in support of their Second Amendment to Petition for Rulemaking.<sup>1</sup>

Under the Appendix B Table of Allotments, WCOV-DT has been allocated channel 16. The allocation specifies that WCOV-DT would operate with a maximum effective radiated power of 1000 kW at a center of radiation of 518 meters above average terrain. The allotment also specifies an Antenna ID of 29552 which is consistent with that specified in the existing WCOV-DT construction permit.<sup>2</sup>

In October of 2007, Woods sought reconsideration of this allotment requesting that the Commission assign channel 20 for its use at Montgomery, Alabama instead of channel sixteen. Channel 20 is the channel that is current utilized by WCOV for its NTSC operations, and this requested change would permit WCOV-DT to utilize its existing analog antenna in the post-transition environment. The modified allotment did not specify a change in the geographic coordinates or antenna center of radiation above average terrain. Only the channel of operation and Antenna ID were requested to be changed.<sup>3</sup>

In the Memorandum Opinion and Order on Reconsideration of the Seventh Report and Order and Eighth Report and Order, the Commission denied the petition for reconsideration.<sup>4</sup>

Although the proposed allotment change was consistent with both the 2.0 percent pre-transition

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<sup>1</sup> The facility ID for WCOV-TV is 73642.

<sup>2</sup> Antenna ID 29552 is for a Dielectric model TFU-30DSC-R C170. File number of WCOV-DT construction permit is BPCDT-1991021ACM.

<sup>3</sup> Antenna ID proposed was 68079.

<sup>4</sup> See ¶ 76-77.

interference standard and the subsequently adopted 0.5 percent post-transition interference standard, it failed the 0.1 percent standard utilized for the channel election process. Specifically the Commission noted "...that the proposed operation of WCOV on channel 20 would cause 0.40 percent interference to WIIQ, Demopolis, AL (analog channel 41, digital channel 19 for both pre- and post-transition), 0.17 percent interference to WTBS, Atlanta, GA (analog channel 17, digital channel 20 for both pre- and post-transition), 0.45 percent interference to WMPV, Mobile, AL (analog channel 21, digital channel 20 for both pre- and post-transition), 0.31 percent interference to WYLE, Florence, AL (analog channel 26, digital channel 20 for both pre- and post-transition), and 0.23 percent interference to WDHN, Dothan, AL (analog channel 18, digital channel 21 for both pre-and post-transition)..."

Following the lifting of the freeze, Woods submitted a petition for rulemaking requesting a change in the WCOV allotment to specify channel 20. The parameters specified in that petition for rulemaking were identical to those submitted under the petition for reconsideration of the allotment, and were the same parameters which the Commission implied would comply with the 0.5 percent interference standard. Subsequent recalculation of the predicted interference by both the Staff and Woods yielded predicted interference to the Appendix B facilities of WDHN-DT at Dothan, AL in excess of those permitted under the 0.5 percent standard.<sup>5</sup> Specifically, the revised calculations by the Commission indicated predicted interference to 0.71% of the WDHN-DT Appendix B service area population while Woods calculated interference to 0.70% of the population.<sup>6</sup>

Subsequent to the submission of the amendment to the rulemaking petition, the Staff advised the applicant of three issues requiring rectification before processing could continue. Specifically these issues were that the proposed allocation exceeded the power and height

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<sup>5</sup> The facility ID for WDHN(TV) at Dothan, Alabama is 43846.

<sup>6</sup> Calculations in both instances were based on the standard grid size of 2 km on a side and terrain sample spacing of 1.0 kilometer between points.

limitations imposed under Section 73.622(f)(8)(i), the proposed allocation continued to cause interference in excess of 0.5% to the Appendix B allocation for WDHN-DT at Dothan, Alabama, and the proposed allocation was mutually exclusive with a pending application for WMPV-DT at Mobile, Alabama.<sup>7</sup> This amendment to the petition for rulemaking seeks to address the first two of these concerns with the third to be addressed in a negotiated interference agreement to be subsequently submitted.

In order to address the first issue, the maximum effective radiated power of the proposed allocation would be further reduced from 770 kW to 460 kW. This reduction is consistent with the table in the referenced section of the Commission's Rules which indicates 460 kW as the maximum permissible effective radiated power for UHF facilities operating with the center of radiation at 520 meters above average terrain. The proposed allocation would operate with a center of radiation above average terrain of 518 meters.

The reduction in the maximum effective radiated power also results in a reduction in the predicted interference to the Appendix B allocation for WDHN-DT at Dothan, Alabama. Exhibit E-1 illustrates the areas of predicted interference to WDHN-DT from the proposed allocation. A tabulation of the affected population is contained in Exhibit E-2. This reduction in the effective radiated power will also reduce the level of predicted interference from WCOV-DT to other facilities in the region. Exhibits E-3 and E-4 respectively illustrate and tabulate the predicted interference to other relevant facilities.

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<sup>7</sup> The Facility ID for WMPV-TV at Mobile, AL is 60827. Pending application for that facility is BPCDT-20080829ABI.

Although a further reduction in the effective radiated power is proposed, no change is proposed to any of the other parameters relevant to the allocation. The parameters proposed for the WCOV-DT allocation are summarized at the conclusion of this engineering statement. It should be noted, however, that the center of radiation above mean sea level assigned to allocation by the Staff continues to be incorrect. The center of radiation above mean sea level should be 659.0 meters and not the 643.0 meters that the Commission continues to utilize. This center of radiation is consistent not only with the average terrain sampling but also with the outstanding construction permit for NTSC operations on channel 20 for WCOV-TV.<sup>8</sup> It is respectfully requested that the Commission modify the center of radiation above mean sea level for the WCOV-DT allotment to be consistent with the actual value utilized by the existing antenna, which will be utilized in the post-transition environment.

The proposed allocation would provide the requisite service to the community of license of Montgomery, Alabama. The map in Exhibit E-5 illustrates the predicted 48 and 41 dBu F(50,90) service contours along with the Longley-Rice predicted field strength bounded by the 41 dBu contour. As this map demonstrates, the entire community of Montgomery would receive a signal level of 48 dBu or greater. Furthermore, the proposed allocation has a greater footprint than the analog Grade B service contour as illustrated in Exhibit E-6. As a result, no loss of population served by WCOV-DT would occur with the transition to digital.

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<sup>8</sup> See FCC File Nos. BPCT-20041103ADU and BLCT-20050817AAE. The referenced license application has been pending before the Commission since August of 2005.

These exhibits demonstrate compliance with the Commission's various relevant criteria.

Woods therefore further amends its petition for the following modification to the digital television table of allotments contained in §73.622(i) of the Commission's Rules:

**Current:**  
Montgomery, AL 12, 16, \*27, 32, 46

**Proposed:**  
Montgomery, AL 12, 20, \*27, 32, 46

The proposed modification to the table of allotments would be made pursuant to the following technical parameters:

Channel of Operation: 20  
Latitude: 31-58-28 North  
Longitude: 086-09-44 West  
DTV ERP (kw): 460 kW  
DTV HAAT (m): 518 meters<sup>9</sup>  
DTV COR AMSL (m) 659.0 meters<sup>10</sup>  
Antenna ID: 68079

The preceding statement and attached exhibits has been prepared by me, or under my direction, and are true and accurate to the best of my belief and knowledge.



Above signature is digitized copy of actual signature  
License Expires November 30, 2009

Jeremy D. Ruck, PE  
September 24, 2008

<sup>9</sup> Height above average terrain is based on 8 radial sample of 3-second linearly interpolated terrain database. Actual height above average terrain is 518.48 meters, which corresponds to a center of radiation at 659.0 meters above mean sea level. This height is consistent with the antenna proposed for use.  
<sup>10</sup> See discussion in the first paragraph on page 4 of this engineering statement.

**WCOV-D.P.A2**

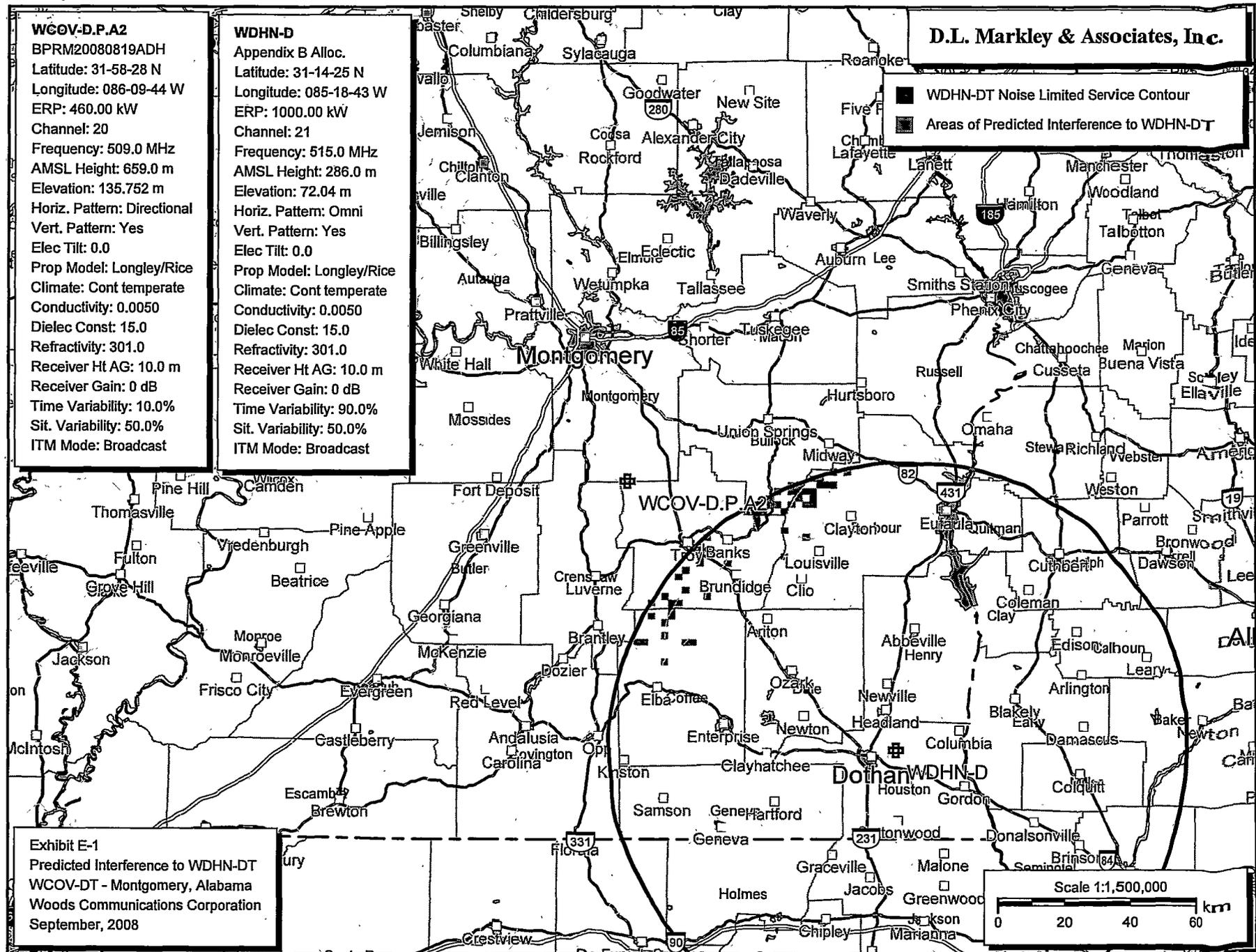
BPRM20080819ADH  
 Latitude: 31-58-28 N  
 Longitude: 086-09-44 W  
 ERP: 460.00 kW  
 Channel: 20  
 Frequency: 509.0 MHz  
 AMSL Height: 659.0 m  
 Elevation: 135.752 m  
 Horiz. Pattern: Directional  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: Longley/Rice  
 Climate: Cont temperate  
 Conductivity: 0.0050  
 Dielec Const: 15.0  
 Refractivity: 301.0  
 Receiver Ht AG: 10.0 m  
 Receiver Gain: 0 dB  
 Time Variability: 10.0%  
 Sit. Variability: 50.0%  
 ITM Mode: Broadcast

**WDHN-D**

Appendix B Alloc.  
 Latitude: 31-14-25 N  
 Longitude: 085-18-43 W  
 ERP: 1000.00 kW  
 Channel: 21  
 Frequency: 515.0 MHz  
 AMSL Height: 286.0 m  
 Elevation: 72.04 m  
 Horiz. Pattern: Omni  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: Longley/Rice  
 Climate: Cont temperate  
 Conductivity: 0.0050  
 Dielec Const: 15.0  
 Refractivity: 301.0  
 Receiver Ht AG: 10.0 m  
 Receiver Gain: 0 dB  
 Time Variability: 90.0%  
 Sit. Variability: 50.0%  
 ITM Mode: Broadcast

**D.L. Markley & Associates, Inc.**

- WDNH-DT Noise Limited Service Contour
- Areas of Predicted Interference to WDNH-DT

**Exhibit E-1**

Predicted Interference to WDNH-DT  
 WCOV-DT - Montgomery, Alabama  
 Woods Communications Corporation  
 September, 2008

Scale 1:1,500,000

0 20 40 60 km

Exhibit E-2  
 Outgoing Interference Population Report  
 Proposed WCOV-DT Post-Transition Facilities

WCOV-D.P.A2 (20) Montgomery, AL - BPRM20080819ADH  
 Broadcast Type: Digital Service: T  
 Lat: 31-58-28 N Lng: 086-09-44 W ERP: 460.0 kW AMSL: 659.0 m  
 TV Outgoing Interference Study  
 Signal Resolution: 2.0 km  
 Consider NTSC Taboo: Yes  
 KWX error points are considered to  
     be interference free coverage.  
 Default # of radials computed for contours: 72  
 Contours calculated using 8 radial HAAT.  
 LR Profile Spacing Increment: 1.0 km  
 Masked interference points are being  
     counted as interference.  
 Pop Centroid DB: 2000 US Census (SF1)

Study Date: 9/24/2008  
 TV Database Date: 9/24/2008

Primary Terrain: V-Soft 3 Second US Terrain  
 Secondary Terrain: V-Soft 30 Second US Database

Population Database: 2000 US Census (SF1)

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 Stations Considered:

Call Letters	City	State	Dist	Bear
WDHN-D (21)	DOTHAN	AL	114.6	135.0

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
WDHN-D (21)	228.1	321	439,232	0	653	0.1

	Housing Units	Population
Alabama		
Barbour County		
Total	12,461	29,038
WDHN-D (21)	111	236
Bullock County		
Total	4,727	11,714
WDHN-D (21)	58	106
Coffee County		
Total	19,837	43,615
WDHN-D (21)	69	133

Pike County

Total

13,981

29,605

WDHN-D (21)

83

178

**WCOV-D.P.A2**  
 BPRM20080819ADH  
 Latitude: 31-58-28 N  
 Longitude: 086-09-44 W  
 ERP: 460.00 kW  
 Channel: 20  
 Frequency: 509.0 MHz  
 AMSL Height: 659.0 m  
 Elevation: 135.752 m  
 Horiz. Pattern: Directional  
 Vert. Pattern: Yes  
 Elec Tilt: 0.0  
 Prop Model: Longley/Rice  
 Climate: Cont temperate  
 Conductivity: 0.0050  
 Dielec Const: 15.0  
 Refractivity: 301.0  
 Receiver Ht AG: 10.0 m  
 Receiver Gain: 0 dB  
 Time Variability: 10.0%  
 Sit. Variability: 50.0%  
 ITM Mode: Broadcast

**D.L. Markley & Associates, Inc.**

- ☒ WCOV-D,P.A2
- WIIQ-D
- WIIQ-D
- WMPN-D
- WMPN-D,C
- WMPV-D
- WMPV-D
- WMPV-D,A
- WPCH-D
- WPCH-D
- WYLE-D
- WYLE-D,A
- WYLE-D,C

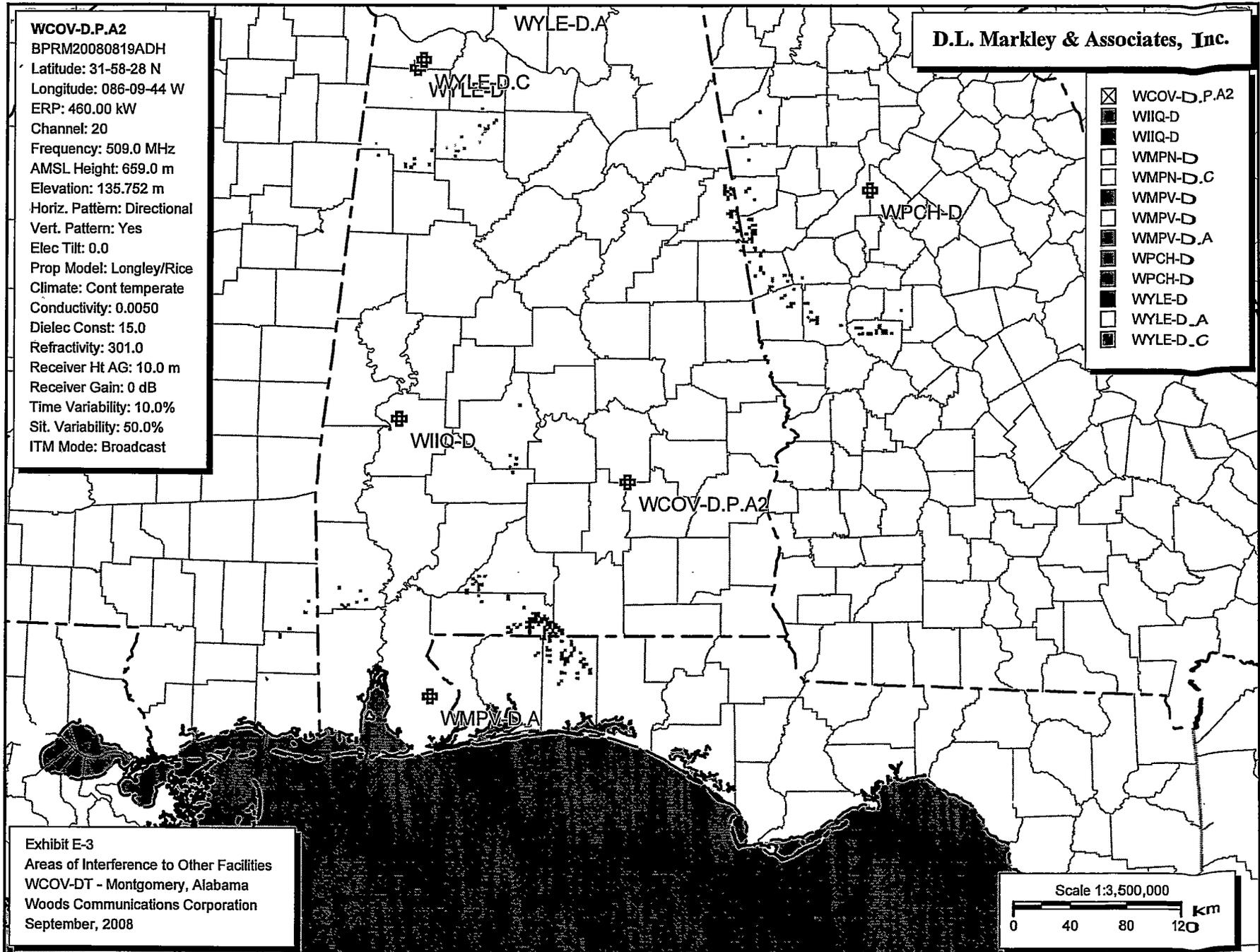


Exhibit E-3  
 Areas of Interference to Other Facilities  
 WCOV-DT - Montgomery, Alabama  
 Woods Communications Corporation  
 September, 2008

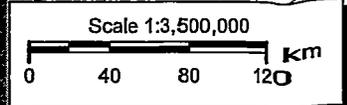


Exhibit E-4  
 Outgoing Interference Population Report  
 Proposed WCOV-DT Allocation Facilities

WCOV-D.P.A2 (20) Montgomery, AL - BPRM20080819ADH  
 Broadcast Type: Digital Service: T  
 Lat: 31-58-28 N Lng: 086-09-44 W ERP: 460.0 kW AMSL: 659.0 m  
 TV Outgoing Interference Study  
 Signal Resolution: 2.0 km  
 Consider NTSC Taboo: Yes  
 KWX error points are considered to  
 be interference free coverage.  
 Default # of radials computed for contours: 72  
 Contours calculated using 8 radial HAAT.  
 LR Profile Spacing Increment: 1.0 km  
 Masked interference points are being  
 counted as interference.  
 Pop Centroid DB: 2000 US Census (SF1)

Study Date: 9/24/2008  
 TV Database Date: 9/24/2008

Primary Terrain: V-Soft 3 Second US Terrain  
 Secondary Terrain: V-Soft 30 Second US Database

Population Database: 2000 US Census (SF1)

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 Stations Considered:

Call Letters	City	State	Dist	Bear
WIIQ-D (19)	DEMOPOLIS	AL	166.5	285.4
WIIQ-D (19)	Demopolis	AL	166.5	285.4
WMPN-D (20)	JACKSON	MS	401.3	274.6
WMPN-D.C (20)	Jackson	MS	401.3	274.6
WMPV-D (20)	MOBILE	AL	204.4	222.7
WMPV-D (20)	Mobile	AL	204.4	222.7
WMPV-D.A (20)	Mobile	AL	204.4	222.7
WPCH-D (20)	ATLANTA	GA	265.3	39.5
WPCH-D (20)	Atlanta	GA	265.3	39.5
WYLE-D (20)	FLORENCE	AL	325.7	332.8
WYLE-D.A (20)	Florence	AL	347.8	345.2
WYLE-D.C (20)	Florence	AL	328.8	333.9

Call	Area	HUnits	Contour	Masked Ix	Unmasked Ix	%
WIIQ-D (19)	12.4	491	352,705	0	1,292	0.4
WIIQ-D (19)	20.7	538	377,049	0	1,378	0.4
WMPN-D (20)	0.0	0	827,571	0	0	0.0
WMPN-D.C (20)	0.0	0	827,571	0	0	0.0

WMPV-D (20)	129.6	347	1,113,929	0	771	0.1
WMPV-D (20)	129.6	347	1,113,929	0	771	0.1
WMPV-D.A (20)	418.1	1,342	1,286,367	0	3,130	0.2
WPCH-D (20)	399.5	5,437	4,838,778	0	13,219	0.3
WPCH-D (20)	403.6	5,459	4,839,594	0	13,279	0.3
WYLE-D (20)	64.7	359	357,636	0	798	0.2
WYLE-D.A (20)	0.0	0	712,191	0	0	0.0
WYLE-D.C (20)	48.5	95	378,393	0	191	0.1

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	Housing Units	Population
Alabama		
Cleburne County		
Total	6,189	14,123
WPCH-D (20)	417	998
WPCH-D (20)	439	1,053
Conecuh County		
Total	7,265	14,089
WMPV-D (20)	0	0
WMPV-D (20)	0	0
WMPV-D.A (20)	58	130
Covington County		
Total	18,578	37,631
WMPV-D.A (20)	16	24
Dallas County		
Total	20,450	46,365
WIIQ-D (19)	491	1,292
WIIQ-D (19)	501	1,322
Escambia County		
Total	16,544	38,440
WMPV-D (20)	187	400
WMPV-D (20)	187	400
WMPV-D.A (20)	237	453
Lamar County		
Total	7,517	15,904
WYLE-D (20)	0	0
Lawrence County		
Total	15,009	34,803
WYLE-D.C (20)	0	0
Marion County		
Total	14,416	31,214
WYLE-D (20)	238	515
WYLE-D.C (20)	9	9
Monroe County		
Total	11,343	24,324
WMPV-D.A (20)	15	37
Randolph County		
Total	10,285	22,380
WPCH-D (20)	43	104
WPCH-D (20)	43	104
Washington County		

Total	8,123	18,097
WMPV-D (20)	66	151
WMPV-D (20)	66	151
WMPV-D.A (20)	1	3
Wilcox County		
Total	6,183	13,183
WIIQ-D (19)	37	56
Winston County		
Total	12,502	24,843
WYLE-D (20)	121	283
WYLE-D.C (20)	86	182
Florida		
Okaloosa County		
Total	78,593	170,498
WMPV-D (20)	81	190
WMPV-D (20)	81	190
WMPV-D.A (20)	955	2,353
Santa Rosa County		
Total	49,119	117,743
WMPV-D (20)	13	30
WMPV-D (20)	13	30
WMPV-D.A (20)	0	0
Georgia		
Carroll County		
Total	34,067	87,268
WPCH-D (20)	1,444	3,289
WPCH-D (20)	1,444	3,289
Coweta County		
Total	33,182	89,215
WPCH-D (20)	15	40
WPCH-D (20)	15	40
Floyd County		
Total	36,615	90,565
WPCH-D (20)	406	865
WPCH-D (20)	406	865
Haralson County		
Total	10,719	25,690
WPCH-D (20)	38	99
WPCH-D (20)	38	99
Heard County		
Total	4,512	11,012
WPCH-D (20)	330	776
WPCH-D (20)	335	789
Lamar County		
Total	6,145	15,912
WPCH-D (20)	371	939
WPCH-D (20)	371	939
Meriwether County		
Total	9,211	22,534
WPCH-D (20)	120	249
WPCH-D (20)	120	249
Polk County		

Total	15,059	38,127
WPCH-D (20)	1,027	2,833
WPCH-D (20)	1,027	2,833
<i>Troup County</i>		
Total	23,824	58,779
WPCH-D (20)	239	611
WPCH-D (20)	234	603
<i>Upson County</i>		
Total	11,616	27,597
WPCH-D (20)	987	2,416
WPCH-D (20)	987	2,416
<i>Mississippi</i>		
<i>George County</i>		
Total	7,513	19,144
WMPV-D.A (20)	19	28
<i>Greene County</i>		
Total	4,947	13,299
WMPV-D.A (20)	41	102
<i>Jackson County</i>		
Total	51,678	131,420
WMPV-D.A (20)	0	0

**WCOV-D.P.A**  
 BPRM20080819ADH  
 Latitude: 31-58-28 N  
 Longitude: 086-09-44 W  
 ERP: 460.00 kW  
 Channel: 20  
 Frequency: 509.0 MHz  
 AMSL Height: 659.0 m  
 Elevation: 135.752 m  
 Horiz. Pattern: Directional  
 Vert. Pattern: No  
 Prop Model: Longley/Rice  
 Climate: Cont temperate  
 Conductivity: 0.0050  
 Dielec Const: 15.0  
 Refractivity: 311.0  
 Receiver Ht AG: 10.0 m  
 Receiver Gain: 0 dB  
 Time Variability: 90.0%  
 Sit. Variability: 50.0%  
 ITM Mode: Broadcast

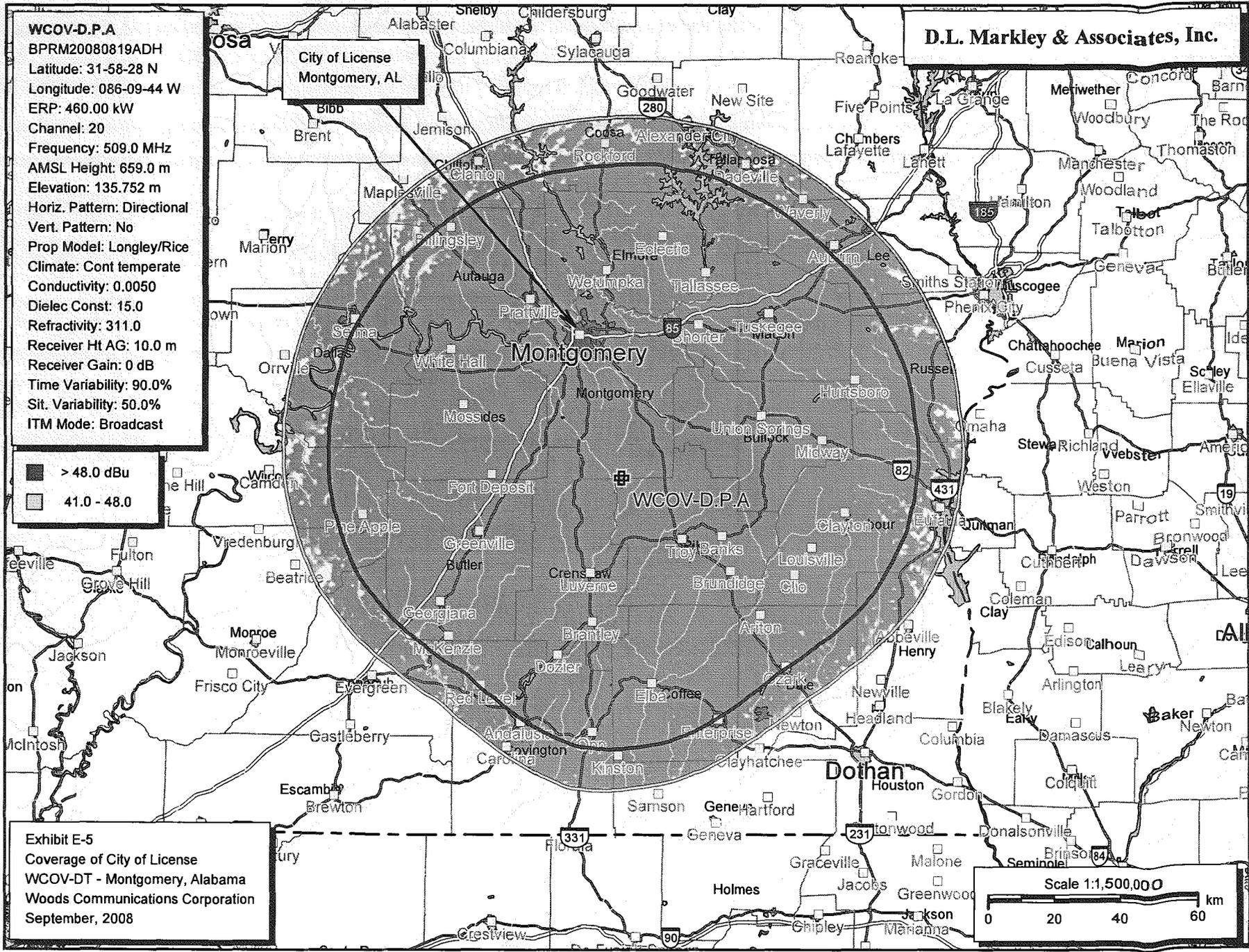
**City of License**  
**Montgomery, AL**

**D.L. Markley & Associates, Inc.**

■ > 48.0 dBu  
 □ 41.0 - 48.0

Exhibit E-5  
 Coverage of City of License  
 WCOV-DT - Montgomery, Alabama  
 Woods Communications Corporation  
 September, 2008

Scale 1:1,500,000  
 0 20 40 60 km



D.L. Markley & Associates, Inc.

**WCOV-D.P.A.2**

BPRM20080819ADH  
Latitude: 31-58-28 N  
Longitude: 086-09-44 W  
ERP: 460.00 kW  
Channel: 20  
Frequency: 509.0 MHz  
AMSL Height: 659.0 m  
Elevation: 135.752 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 0.0  
Prop Model: FCC Method

**WCOVTV.C**

BPCT20041103ADU  
Latitude: 31-58-28 N  
Longitude: 086-09-44 W  
ERP: 2742.00 kW  
Channel: 20Z  
Frequency: 509.0 MHz  
AMSL Height: 659.0 m  
Elevation: 135.752 m  
Horiz. Pattern: Directional  
Vert. Pattern: Yes  
Elec Tilt: 0.75  
Prop Model: FCC Method

- WCOV-TV Grade B Service Contour
- WCOV-DT Proposed 41 dBu F(50,90) Contour

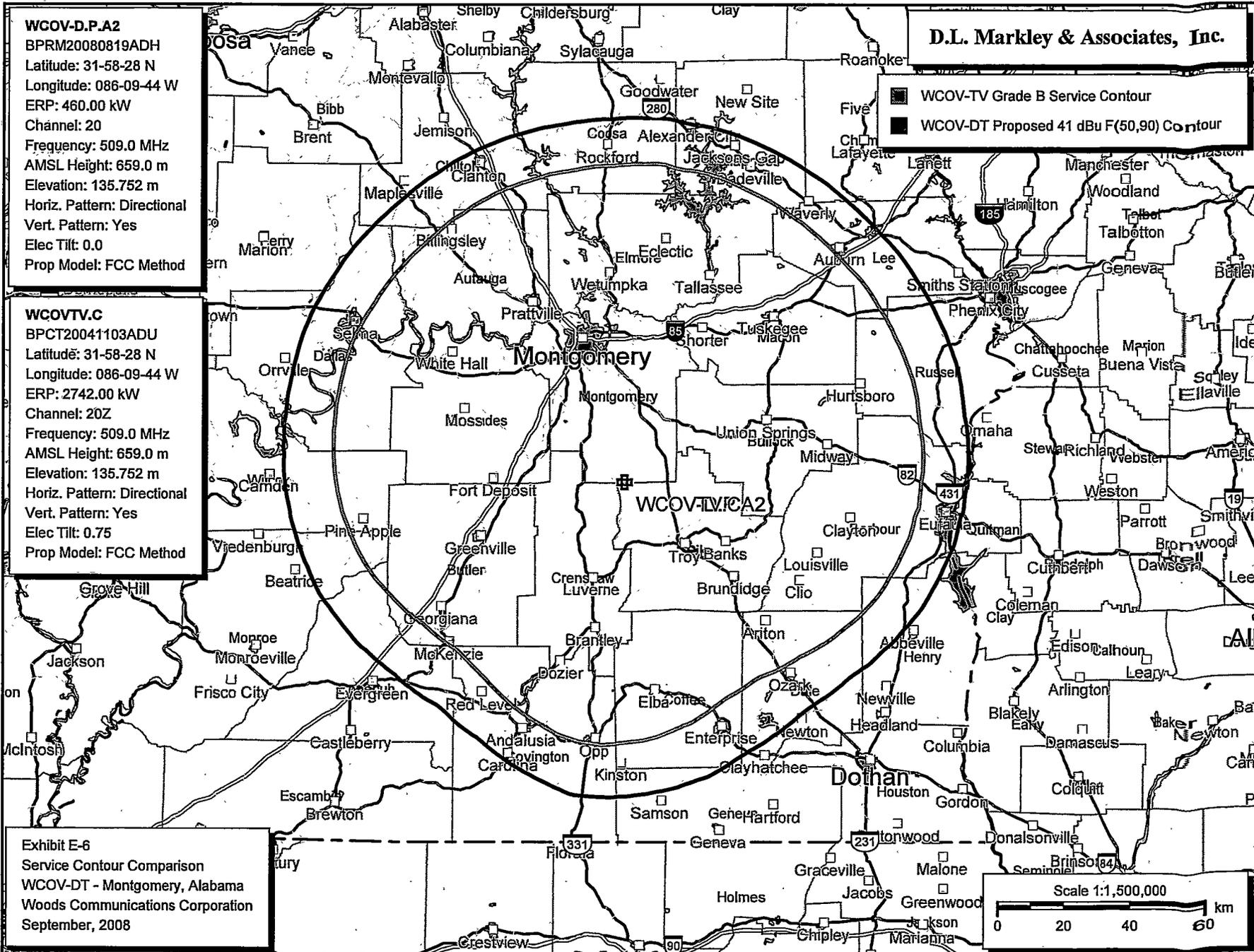


Exhibit E-6  
Service Contour Comparison  
WCOV-DT - Montgomery, Alabama  
Woods Communications Corporation  
September, 2008

